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*Attorney for Defendant*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DARRYL JULIUS POLO,

Defendant.

Case No: 2:22-cr-30-RFB-DJA-2

**STIPULATION AND ORDER  
 TO DELAY SURRENDER AND  
 REPORT DATE (Sixth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through ANTOINETTE T. BACON, Supervisory Official for the Criminal Division, MATTHEW A. LAMBERTI, Senior Counsel, SUE FAHAMI, Acting United States Attorney, JESSICA OLIVA, Assistant United States Attorney, and DARRYL POLO, by and through his attorney, RICHARD E. TANASI, ESQ., that the date by which Mr. Polo must surrender to outstanding warrants after the conclusion of the trial in this matter and report to his term of imprisonment in the instant case, now scheduled for April 7, 2025 (ECF No. 646), be vacated and continued to a date sixty (60) days from the date of the last sentencing in this case, currently set for May 30, 2025 (ECF No. 668).

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This Stipulation is entered into for the following reasons:

1. Mr. Polo has been under conditions of release since September 29, 2019. Eastern District of Virginia (“EDVA”) ECF (19-cr-253-MSN). No. 59. On May 7, 2021, he was sentenced to 57 months in prison on four counts related to criminal copyright infringement and one count of money laundering. EDVA ECF 498 and 500.

2. On May 24, 2021, after a consent motion filed by Mr. Polo, Judge Ellis in EDVA ordered Mr. Polo to surrender to any outstanding warrants no later than September 7, 2021 and self-report to his term of imprisonment after September 7, 2021. EDVA No. 515.

2. On August 23, 2021, after a consent motion filed by Mr. Polo, Judge Ellis in EDVA ordered Mr. Polo to surrender to any outstanding warrants no later than February 1, 2022 and self-report to his term of imprisonment after February 1, 2022. EDVA No. 666.

3. On January 5, 2022, after a consent motion filed by Mr. Polo, Judge Nachmanoff in EDVA ordered Mr. Polo to surrender to any outstanding warrants no later than July 18, 2022 and self-report to his term of imprisonment after July 18, 2022. EDVA No. 740.

4. On March 31, 2022, after a consent motion filed by Mr. Polo, Judge Gordon ordered Mr. Polo to surrender to any outstanding warrants no later than seven (7) days following the conclusion of the trial in this matter, and to self-report to his term of imprisonment after the date that he surrenders to any warrants. ECF No. 27.

5. On November 19, 2024, after a stipulation filed by Mr. Polo and the government, this Court ordered Mr. Polo to surrender to any outstanding warrants no later than April 7, 2025, and to self-report to his term of imprisonment after the date that he surrenders to any warrants. ECF No. 646.

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1           6.       The additional time requested herein is sought to allow Mr. Polo time to  
2       comply with the terms of his guilty plea agreement, and to allow the government time to evaluate  
3       whether it intends to file a Motion for a Reduced Sentence under F.R.Crim.P 35(b)(2). The  
4       additional time is not sought for purposes of delay.

5           **WHEREFORE**, the parties respectfully request that this Honorable Court accept the  
6       Stipulation and enter an Order as set forth below, continuing Mr. Polo's surrender and report.  
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1 date in the above-captioned matter to a date sixty (60) days from the date of the last sentencing  
2 in this case, currently set for May 30, 2025. ECF No. 638.

3 DATED this 31<sup>st</sup> day of January 2025.

4  
5 /s/ Matthew A. Lamberti

6 NICOLE M. ARGENTIERI

Principal Deputy Assistant Attorney General and Head of the Criminal Division

7 MATTHEW A. LAMBERTI

8 Senior Counsel

MICHAEL CHRISTIN

9 Trial Attorney

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13 *Attorneys for the United States*

14  
15 /s/ Jessica Oliva

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22  
23 /s/ Richard Tanasi

RICHARD E. TANASI, ESQ.

24 Attorney for the Defendant

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
DARRYL JULIUS POLO,  
Defendant.

) Case No: 2:22-cr-30-RFB-DJA

) **ORDER TO DELAY SURRENDER**  
) **AND REPORT DATE**  
) **(Sixth Request)**

This matter coming before the Court on a Stipulation to Delay Surrender And Report Date, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

**WHEREFORE, IT IS ORDERED THAT** the defendant shall surrender to any outstanding warrants no later than August 4, 2025, and shall self-report to his term of imprisonment after the date that he surrenders to any warrants.

**IT IS FURTHER ORDERED THAT** all conditions of release set forth in the September 25, 2019 Order remain in effect. [See, United States District Court for the Eastern District of Virginia, 1:19-cr-00253-MSN, ECF 59.]

DATED February 3, 2025. :



HON. RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

I HEREBY CERTIFY that I am an employee of Tanasi Law Offices, that on this 31st day of January 2025, the undersigned served a true and correct copy the foregoing **STIPULATION AND ORDER** by U.S. District Court CM/EMF Electronic Filing to all parties in this case.

*/s/ Richard Tanasi*

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An employee of TANASI LAW OFFICES

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